REMARKS

1. Claim amendments:

5   Claim 11 is amended to include all limitations of claim 12. Such amendment expresses the limitations of claim 12 in different terms, as supported by Fig.4 and related description. No new matter is entered.

Consideration of all amendments is respectfully requested.

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2. Rejection of claims 11-20 under 35 U.S.C. 102(e) as being anticipated by Sadowsky et al. (US 6,898,679) hereinafter "Sadowsky":

The applicant contends that the original claim 12 (now claim 11) recites a novel
15   concept. This will be shown by way of an example in which the method of claim 11 leads to a reordering result that Sadowsky does not achieve.

By the nature of Sadowsky's device, and if one considers arbitrary groups, the memory requests at the borders of the groups will indeed end up referencing the same
20   pages. However, Sadowsky does not provide a method that performs group-wise reordering. Referring to Fig. 2, for example, Sadowsky's reordering is done in a stream-wise manner, with no establishment of groups. Referring to Fig. 3, for example, Sadowsky's reordering is done in a FIFO-wise manner (col. 3 lines 5-9, FIFOs are read to empty in a round-robin fashion).

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In contrast, claim 11 recites a group-wise processing in:

establishing at least two request groups for the plurality of read
requests;
30   reordering said read requests according to pages in said memory
device accessed by said read requests into a second request
sequence, wherein within each request group, said read requests

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accessing the same page of said memory device are continuously arranged, and when a current request group has a read request of the same page as a last read request of a previous request group, a first read request of the current request group is ordered to correspond to the page of the last read request of the previous request group;

As such, the invention according to claim 11 can achieve a reordering such as that shown in applicant's Fig. 4. Sadowsky would not achieve this arrangement. Instead, Sadowsky's stream-wise processing of Fig. 2 would result in all of the A and B requests (of Fig.4) being continuously arranged, in addition to the C requests being continuously arranged (e.g. AAAABBBBCCCC). Likewise, Sadowsky's round-robin FIFO-wise processing of Fig. 3 would result in a sequence such as AAAABBBBCCCC or AAABBBCCC. These different results are only examples that highlight the differences of the three methods (Sadowsky's Figs. 2 and 3 and applicant's claim 11).

In summary, the applicant argues that Sadowsky does not teach or suggest all limitations of the amended claim 11. Thus, the applicant requests that the Examiner withdrawal this rejection. Claims 12-20 are dependent and should be allowed if claim 11 is found allowable.

3. Rejection of claim 20 under 35 U.S.C. 112, first paragraph:

Claim 20 is amended to recite "a memory controller stores data in a display controller," placing the claim in its original language. Claim 20 is supported, for instance, by the paragraph of the DETAILED DESCRIPTION beginning with "The graphics chip 18 reads...," a display controller being well-known to comprise a graphics chip 18.

Withdrawal of this rejection is respectfully requested.

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Sincerely yours,

Winston Hsu   Date: ___Oct. 18, 2005___

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